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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 SHEREELAMB,

13 Plaintiff,

14 vs.

15 NAVIENT SOLUTIONS, LLC, EQUIFAX
16 INFORMATION SERVICES, LLC,
17 EXPERIAN INFORMATION SOLUTIONS,
18 INC., and TRANS UNION LLC,

19 Defendants.

20 Case No. 2:18-cv-1966-JCM-NJK

21 **STIPULATION AND ~~PROPOSED~~
22 ORDER TO EXTEND TIME TO FILE
23 RESPONSE TO COMPLAINT**

24 **[SECOND REQUEST]**

25 COME NOW Plaintiff Sheree Lamb (“Plaintiff”) and Defendant Navient Solutions, LLC
26 (“NSL”), by counsel and pursuant to Local Rule 6-1, and stipulate as follows:

27 **STIPULATION**

28 1. On October 11, 2018, Plaintiff filed a Complaint with this Court [ECF No. 1].
29 2. NSL was served with the Complaint on October 12, 2018.
30 3. On November 2, 2018, Plaintiff and NSL filed their first Stipulation and Proposed
31 Order to Extend Time to File Response to Complaint, requesting that NSL’s time to file a response be
32 extended until December 3, 2018. [ECF No. 8].

33 4. The Court granted the requested extension on November 2, 2018. [ECF No. 10].
34 NSL’s response to the Complaint is due on or before December 3, 2018.

1 5. The Parties have initiated settlement discussions. In order to adequately investigate the
2 allegations and explore the possibility of an early resolution, NSL desires an extension until December
3 21, 2018, to file a response to the Complaint.

4 6. Counsel for NSL conferred with counsel for Plaintiff regarding this Stipulation.
5 Counsel for Plaintiff agrees to the requested extension.

6 7. This Stipulation is filed in good faith and not for dilatory or other improper purpose.
7 Plaintiff would not suffer any prejudice by the Court permitting NSL the requested extension of time
8 and has consented to the requested extension.

9 8. This is the second request for extension of time for NSL to respond to the Complaint.
10

11 DATED: November 30, 2018.
12

13 /s/ Matthew W. Park
14 Matthew W. Park
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19 Counsel for Defendant
20 Navient Solutions, LLC

21 /s/ Kevin L. Hernandez
22 Kevin L. Hernandez
23 NV Bar No. 12594
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25 2510 Wigwam Parkway, Suite 206
26 Henderson, NV 89074

27 Counsel for Plaintiff
28 Sheree Lamb

19 **GRANTED in part and DENIED in**
20 part. NSL shall respond to the
21 complaint by December 14, 2018. **NO**
22 **FURTHER EXTENSIONS WILL BE**
23 **GRANTED.**

24 **ORDER**

25 **IT IS SO ORDERED.**

26 
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: December 3, 2018